

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

RECEIVED
2021 MAY 17 PM 12:45
CLERK U.S. DIST. COURT
WEST. DIST. OF MO.
KANSAS CITY, MO.

Floyd McNeal

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 4:21-cv-342-RK
(to be filled in by the Clerk's Office)

① -against-

② Sheriff of Vernon Co. Missouri,
Advanced Health care INC.

③ DR. Laura Voss and Nurse Sam. last name unknown.
ET AL.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Floyd McNeal
Street Address 214 West Farmer St. Apt 2
City and County Independence, Jackson County
State and Zip Code Missouri 64050
Telephone Number 816-469-8419
E-mail Address _____

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name ^① Advance Correctional Health Care Inc.
Job or Title (if known) _____
Street Address 3922 West Baring Trace
City and County Peoria
State and Zip Code Illinois 61615
Telephone Number 309-692-8100
E-mail Address (if known) _____

Defendant No. 2

Name ^② Sheriff of Vernon County Missouri ^④ Sam
^③ Dr. Laura Voss And Nurse last name unknown
Job or Title (if known) Dr. And Nurse
Street Address Vernon County Jail, 2040 Hunter St
City and County Nevada, Vernon County Missouri

State and Zip Code MISSOURI Don't know zip
Telephone Number 417 253-4411
E-mail Address 0
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. (Check all that apply)

☒ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 USC section 1983, 8th Amendment cruel and unusual punishment, Racial Discrimination Violation of the 14th Amendment Equal protection clause, and overcrowding in violation of the 8th Amend.

☐ Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

☐ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) DR. I. VOSS and NURSE SAM, is a citizen of the State of (name) MISSOURI. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) ADVANCED CORP. HEALTHCARE, is incorporated under the laws of the State of (name) ILLINOIS, and has its principal place of business in the State of (name) ILLINOIS. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain):

\$ 500,000.00

III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?

- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please see Facts
Attached

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

\$500,000.00 Jointly and severally

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☒

No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒

No ☐

Do you claim punitive monetary damages?

Yes ☒

No ☐

Factual statement

①. On or about June ²⁰¹⁹ I was locked up in Vernon county Jail from Kansas City, MO as a city prisoner. ② Before coming to this Jail in Vernon County, MO, I was seen by a Dr. from Truman Medical Center Dr. Jeffrey Metzner, Director of mental Health services. ③ I have seen him in the past for mental Health problems. ④. But on this occasion I was seen by him ~~and~~ for major mental problems and prescribed 20mg of Prozac and 50mg Trazadone for my mental condition. ⑤ Upon arriving at the Jail I was transported with all my medications, Prozac and Trazadone and I saw the nurse by the name of ~~SAM~~ SAM, Don't know the last ~~NAME~~ name, and she stated I could not have my Trazadone and I told her the Doctor from Truman approved this.

she stated that Dr. Laura Voss, M.D. who works for Advanced Correctional Health care Inc. said I will not be allowed to have it. (6) I stated that that is wrong because Dr. Laura Voss has not seen me or know anything about my mental conditions, but they ignored me. (7) I complained to the Sheriff's office with no success. The only thing they did was have a correctional officer, passed the meds. out to the prisoner's. During the month of July 2019 there was a person by the name of Chad Johnson, a white person and we talk and I saw he took the same meds as me and he state the nurse and doctor approved his meds of Trazadone and the Dr. never saw him. (8) Also, there was a Mexican man taking Trazadone too but I was never given a

(9)

Medical Reason why I could not have mine
I WAS treated differently Than The white
person or the Mexican person Ever though
~~the~~ we were ~~starving~~ similarly situated.

(9) For The whole Entire stay of over
3 months I was not allowed any
Exercise/Recreation Due to overcrowding
of prisoners placed in The gym and This
is still going on Right now because
The sheriff of Kern county is packing
His Jail with out of county prisoners
To make more money. I Alleged That I
was treated differently by The Defendants
concerning my meds and had mental problems
because of these act on the basis of race

(10) I Also Alleged I was subjected to

cruel and unusual punishment by
not having any exercise time like
all prisoners in the Missouri Dept.
of corrections or the rest of the ^{country} ~~country~~

Thank you

Flayd M. Lee

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$200,000.00 Because The acts complained of
are still occurring as we speak.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5/17, 2021.

Signature of Plaintiff

Printed Name of Plaintiff

Floyd E. McNeel
Floyd McNeel